EXHIBIT

2

PART I

DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL ANSWERS TO INTERROGATORIES, RESPONSES TO REQUESTS FOR PRODUCTION AND TO COMPEL SUBMISSION TO R.34 INSPECTION

-	Page 1
1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF ILLINOIS
3	
4	DISABLED PATRIOTS
5	OF AMERICA, INC.,
6	A FLORIDA CORPORATION,
7	BONNIE KRAMER, INDIVIDUALLY,
8	Plaintiffs,
9	vs. Case No. 1:07CV06362
10	TOWN & COUNTRY
11	CHICAGO ASSOCIATES, LLC,
12	A FOREIGN LIMITED
13	LIABILITY COMPANY,
14	Defendant.
15	·
16	
17	DEPOSITION OF BONNIE KRAMER
18	
19	Taken on Wednesday, January 30, 2008, at 2:15 p.m.
20	At the offices of:
21	Cefaratti Group
22	4608 St. Clair Avenue
23	Cleveland, Ohio
24	Before Kathleen Davian, a Notary Public
25	in and for the State of Ohio

	Case 1:07-cv-06362	Document 19-	-4	Filed 03/06/2008 Page 3 of 22	
1 2 3 4	APPEARANCES: Via telephone On behalf of the Plaintiffs:	Page 2	1 2 3 4	Q. What was the case called in that case? A. RTA. Q. Kramer versus RTA?	Page 4
5 6 7 8 9	THOMAS B. BACON, by 1515 Grant Street Hollywood, Florida 33020 (954) 925-6488 Baconlaw@bellsouth.net		5 6 7 8 9	A. Correct. Q. And the other plaintiff in that case is Disabled Patriots of America? A. Yes. Q. Where is that case pending?	
11 12 13 14 15	Via telephone On behalf of the Defendant: Meckler, Bulger & Tilson, by MICHAEL I. LEONARD, ESQ. 123 North Wacker Drive		11 12 13 14 15	A. In Cleveland, Ohio. Q. In federal court or state court? A. Federal court. Q. And who are your attorneys	
16 17 18 19 20 21	Suite 1800 Chicago, Illinois 60606 (312) 474-7925 Michael.Leonard@mbtlaw.com		16 17 18 19 20	in that case? A. Tom Bacon and Larry Fuller. Q. And what firm is Mr. Fuller with? A. I'm sorry? Q. Did you say Larry Fuller?	
22 23 24 25	· · ·		22 23 24 25	A. Yes.Q. And what firm is he with?A. Fuller, Fuller.Q. Is that in Cleveland?	
1 2 3 4 5 6	BONNIE KRAMER, of lawful age called for examination, as provided by the Federal Rules of Civil Procedure, being by me first duly sworn, as hereinafter certified, deposed and said as follows:	d l	1 2 3 4 5 6	A. No, it's in Miami. Q. And what's the status of that case? It's just engaged in discovery? A. Yeah, I think so. Ask Tom, he knows.	Page 5
7 8 9 10 11 12 13	EXAMINATION OF BONNIE KR. BY-MR.LEONARD: Q. Ma'am, good afternoon. A. Hi. Q. As you know, my name is Note the defendant. A. Hm-hm.	Mike :	7 8 9 10 11 12	Q. And then the other case that you were deposed in? A. Crocker Park. Q. How do you spell that for the record? A. C R O C K E R. Q. That's the defendant?	
14 15 16 17 18 19	Q. And today we're here to tall your deposition by telephone conferer Okay. I assume that you had your deposition taken previously? A. I have.	nce.	14 15 16 17 18	A. Yes. Q. And you and Disabled Patriots of America are the plaintiffs? A. Correct. Q. And that's in federal court in Cleveland?	
20 21 22 23	Q. Approximately how many to A. Twice before. Q. Can you tell me how long a was that?	ago 2	20 21 22 23	A. Yes. Q. And what's the status of that case? A. It is resolved.	

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	Page 6			Page 8
1	decided to make the fixes on the	1	A. Yes.	_
2	property to make it more accessible.	2	Q. And if you need a break at	
3	Q. And who were your attorneys	3	any time and there's not a question	
4	in that case?	4	pending, please let me know and we'll	
5	A. Todd Shulby.	5	accommodate you, okay?	
6	Q. Can you spell that for the	6	A. Yes.	
7	record?	7		
8		i	Q. Have you taken any	
	A. TODD, SHULBY.	8	medications in the last 24 hours?	
9	Q. And do you have your	9	A. Yes.	
10	deposition do you have copies of your	10	Q. And what have you taken?	
11	transcripts from those two cases?	11	A. I take heart prophylactic	
12	A. I don't have them, no.	12	medication every single day.	
13	Q. Who has them?	13	Q. What medication is that?	
14	A. The court reporter.	14	A. I take Lipitor. I take	
15	Q. Okay. And do you know what	15	Metoprolol and I take something called	
16	court reporter service you used for	16	I'm blanking. I have another	
17	those two depos?	17	medication that I take every day.	
18	A. I do not know offhand but I	18	Q. I'm sorry, what was the last	
19	could I have obviously have copies	19	one?	
20		1		
	of where it was where they're being	20	A. I'm trying to think of the	
21	stored at home.	21	name of it and I cannot think of the	
22	Q. And, ma'am, just for the	22	name of it right now.	
23	record, the rules are probably identical	23	Q. How often and what dosage do	
24	to what you've been through before. But	24	you take of Lipitor?	
25	as you know I ask you verbal questions	25	A. I take 10 milligrams of	
	Page 7			Page 9
1	and ask you to give verbal responses.	1	Lipitor at bedtime.	•
2	From time to time Mr. Bacon may make	2	Q. At bedtime?	
3	objections to the questions. Because	3	A. Yeah, 10 milligrams.	
4	it's by telephone, particularly, you	4	Q. And the second one, Med	
5		1		
	need to wait, let him say whatever he's	5	A. Metoprolol.	
6	going to say, and then unless someone	6	Q. You take that how often and	
7	tells you not to answer the question, to	7	how much?	
8	proceed to answer the question, okay?	8	A. Every morning and I don't	
9	A. Yes.	9	know how much.	
10	Q. It's also important,	10	Q. And you took that this	
11	particularly, since it's by phone that	11	morning?	
12	you wait until I finish my question	12	A. Yes, I did.	
13	before you begin to answer it because	13	Q. And that doesn't affect your	
14	otherwise I won't hear what you've said	14	ability to testify, right?	
15	and the court reporter won't have a	15	A. Not at all.	
16	clear record, okay?	16	Q. And the third one, you don't	
17	A. Yes.			
		17	recall how often you take it and what	
18	Q. Is there any reason because	18	dosage?	
40	The state of the s		A FIGHT I GON'T FOCALL	
19	of medications, tiredness, any other	19	A. Right, I don't recall.	
20	of medications, tiredness, any other reason whatsoever you can't give	20	Q. But I know you don't	
20 21	of medications, tiredness, any other reason whatsoever you can't give complete and truthfully testimony here	20 21	Q. But I know you don't remember the name of it but how often	
20 21 22	of medications, tiredness, any other reason whatsoever you can't give	20	Q. But I know you don't	
20 21	of medications, tiredness, any other reason whatsoever you can't give complete and truthfully testimony here	20 21	Q. But I know you don't remember the name of it but how often	
20 21 22	of medications, tiredness, any other reason whatsoever you can't give complete and truthfully testimony here today?	20 21 22	Q. But I know you don't remember the name of it but how often do you take	
20 21 22	of medications, tiredness, any other reason whatsoever you can't give complete and truthfully testimony here today?	20 21 22	Q. But I know you don't remember the name of it but how often do you take	

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		Page 10			Page 12
1	dosage offhand.		1	conference yesterday and who was it	
2	Q. And all three of those are		2	with?	
3	for your heart?		3	A. Just Tom Bacon and not	
4	A. Yes.		4	Q. Not Mr. Fuller?	
5	Q. And likewise, the third does		5	A. Not Mr. Fuller.	
6	not impede your memory in any way?		6	Q. And that conversation lasted	
7	A. Not at all.		7	less than half an hour?	
8	Q. Do you take any other		8	A. Yes.	
9	medications at all?		9	Q. Did you look at any	
10	A. No.		10	documents during the conference?	
11	Q. Hello?		11	A. Some photographs.	
12	A. No.		12	Q. Photos?	
13	Q. Okay. And that's, again,		13	A. Yes.	
14	you need to wait for a second, so that		14	Q. How many?	
15	the question's fully done because		15	A. I don't know.	
16	otherwise I don't hear your answer.		16	Q. Approximately, ma'am.	
17	Ma'am, I want to ask you first		17	A. 20.	
18	some questions about your background	ł	18	Q. Are these pictures that you	
19	before we get to that.	•	19	took?	
20	What did you do to prepare to		20	A. Yes.	
21	testify here today?		21	Q. And they are of the premises	
22	A. Talked to my attorney.		22	described in the complaint in this case?	
23			23		
	Q. Mr. Bacon?			A. Yes, they are pictures that	
24	A. Yes.		24 25	my boyfriend took.	
25	Q. When?		25	Q. Who's your boyfriend?	
ļ		Page 11			Page 13
1					_
1	A. Yesterday.		1	A. David Lott.	_
1 2	A. Yesterday.Q. On the phone?		1 2	A. David Lott.Q. Can you spell his name for	-
	· · · · · · · · · · · · · · · · · · ·				-
2	Q. On the phone?		2	Q. Can you spell his name for	·
2 3	Q. On the phone?A. Yes.		2 3	Q. Can you spell his name for the record?	
2 3 4 5	Q. On the phone?A. Yes.Q. For how long?		2 3 4	Q. Can you spell his name for the record? A. DAVID, LOTT. Q. Where does he live?	
2 3 4	Q. On the phone?A. Yes.Q. For how long?A. I don't know how long it		2 3 4 5	Q. Can you spell his name for the record? A. DAVID, LOTT.	
2 3 4 5 6 7	Q. On the phone? A. Yes. Q. For how long? A. I don't know how long it was.		2 3 4 5 6	Q. Can you spell his name for the record? A. D A V I D, L O T T. Q. Where does he live? A. In Cleveland Heights, Ohio. Q. And what's his address?	
2 3 4 5 6	Q. On the phone? A. Yes. Q. For how long? A. I don't know how long it was. Q. Was it less than a half hour?		2 3 4 5 6 7	Q. Can you spell his name for the record? A. D A V I D, L O T T. Q. Where does he live? A. In Cleveland Heights, Ohio. Q. And what's his address? A. 2393 South Taylor Road,	
2 3 4 5 6 7 8 9	Q. On the phone? A. Yes. Q. For how long? A. I don't know how long it was. Q. Was it less than a half hour? A. Probably, yeah.		2 3 4 5 6 7 8	Q. Can you spell his name for the record? A. D A V I D, L O T T. Q. Where does he live? A. In Cleveland Heights, Ohio. Q. And what's his address? A. 2393 South Taylor Road, Cleveland Heights, Ohio, 44118.	
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2 3 4 5 6 7 8 9 10 11 12	Q. On the phone? A. Yes. Q. For how long? A. I don't know how long it was. Q. Was it less than a half hour? A. Probably, yeah. Q. Was it just the two of you as part of A. Mr. Fuller was present on		2 3 4 5 6 7 8 9 10 11 12	Q. Can you spell his name for the record? A. D A V I D, L O T T. Q. Where does he live? A. In Cleveland Heights, Ohio. Q. And what's his address? A. 2393 South Taylor Road, Cleveland Heights, Ohio, 44118. Q. I'm sorry? A. 2393. Q. What's the street?	
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		Page 14			Page 16
1	you during the telephone conference		1	Cleveland to the Chicago area?	-
2	yesterday?		2	A. Drove in a car.	
3	A. Nothing.		3	Q. Who drove?	
4	Q. How long have you had a		4	A. David Lott.	
5	relationship with Mr. Lott?	•	5	Q. Are you able to drive,	
6	A. 15 years.		6	ma'am?	
7	Q. Are you married?		7	A. No.	
8	A. No.		8	Q. When was the last time you	
9	Q. Have you ever been married		9	drove a car?	
10	to him?		10	A. 1995.	
11	A. No.		11	Q. And why did you stop	
12	Q. Have you ever been married?		12	driving?	
13	A. Yes.		13	A. When I went into the	
14	Q. When?		14		
	· · · · · · · · · · · · · · · · · · ·			wheelchair or I was starting to not feel	
15	A. A long time ago. I got		15	as comfortable in control of the car	
16	married in 1978 and I was married for		16	moving my feet.	
17	13 years.		17	Q. Are you physically able to	
18	Q. To who?		18	drive, if you want to?	
19	A. To Paul Balzer.		19	A. If I could have hand	
20	Q. Can you spell the last name		20	controls.	
21	for the record?		21	Q. Have you ever tried to drive	
22	A. BALZER.		22	since 1995?	
23	Q. And where does he currently		23	A. No.	
24	reside?		24	Q. Has anyone ever told you you	
25	A. Albany, New York.		25	can't drive?	
	······································				
		Dago 15			Page 17
1	O And where was the divorce	Page 15	1	A No	Page 17
1	Q. And where was the divorce	Page 15	1 2	A. No.	Page 17
2	filed?	Page 15	2	Q. Do you have a license?	Page 17
2 3	filed? A. Cleveland, Ohio.	Page 15	2 3	Q. Do you have a license?A. No.	Page 17
2 3 4	filed? A. Cleveland, Ohio. Q. In state court?	Page 15	2 3 4	Q. Do you have a license?A. No.Q. When did you last have a	Page 17
2 3 4 5	filed? A. Cleveland, Ohio. Q. In state court? A. Yes.	Page 15	2 3 4 5	Q. Do you have a license? A. No. Q. When did you last have a license?	Page 17
2 3 4 5 6	filed? A. Cleveland, Ohio. Q. In state court? A. Yes. Q. And have you been married	Page 15	2 3 4 5 6	Q. Do you have a license? A. No. Q. When did you last have a license? A. It's been a long time. It's	Page 17
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,		Page 18			Page 20
1	Q. And your son, his name is?		1	complaint sometime in August of 2007?	
2	A. Matthew Fields.		2	 Well, we were driving, again, 	
3	Q. Spell his last name for the		3	out in what felt like the boonies and	
4	record.		4	we saw a mall that had a Best Buy and	
5	A. FIELDS.		5	he was looking for something. I needed	
6	Q. And what's his address?		6	to pick up something at the drug store	
7	A. I don't know offhand.		7	and there was a Super Dominic's	
8	Q. What town does he live in?		8	supermarket. I wanted something there	
9	A. Chicago proper.		9	also.	
10	Q. In Chicago city?		10	Q. So let me get this. Where	
11	A. Yeah.		11	were you going on that occasion?	
12	Q. Did he ever live anywhere		12	A. Matthew was going to	
13	else in the Chicago area?		13	interview be interviewed by a client	
14	A. No.		14	in the a prospective client or	
15	Q. And when you went to visit		15	something in Arlington.	
16			16	<u> </u>	
17	your son in the you went to visit your son in the City of Chicago, what		17	Q. In Arlington. Do you have that's the name of the town?	
18				A. Yes.	
19	were you doing in town where this premises was located?		18 19		
1	•			Q. It's called Arlington?	
20	A. Well, he's a disc jockey for		20	A. Yes.	
21	one thing. He had a sick client so we		21	Q. And you had never been in	
22	went out someplace.		22	that town ever before?	
23	Q. First of all, how many days		23	A. No, never.	
24	were you visiting your son on this		24	Q. And who was driving?	
25	occasion?		25	A. David, my boyfriend.	
1					
		Page 19			Page 21
1	A. Four days.	Page 19	1	Q. So just the three of you?	Page 21
	•	Page 19		Q. So just the three of you? A. Yes.	Page 21
2	Q. And where did you stay?	Page 19	2	A. Yes.	Page 21
2	Q. And where did you stay?A. Different places. We stayed	Page 19	2 3	A. Yes.Q. And you said who initially	Page 21
2 3 4	Q. And where did you stay? A. Different places. We stayed at Skokie. A place in Skokie,	Page 19	2 3 4	A. Yes. Q. And you said who initially wanted to stop?	Page 21
2 3 4 5	Q. And where did you stay? A. Different places. We stayed at Skokie. A place in Skokie, Doubletree.	Page 19	2 3 4 5	A. Yes. Q. And you said who initially wanted to stop? A. We both wanted to stop. It	Page 21
2 3 4 5 6	Q. And where did you stay? A. Different places. We stayed at Skokie. A place in Skokie, Doubletree. Q. Okay.	Page 19	2 3 4 5 6	A. Yes. Q. And you said who initially wanted to stop? A. We both wanted to stop. It was a really hot day.	Page 21
2 3 4 5 6 7	Q. And where did you stay? A. Different places. We stayed at Skokie. A place in Skokie, Doubletree. Q. Okay. A. Spent two nights there and	Page 19	2 3 4 5 6 7	A. Yes. Q. And you said who initially wanted to stop? A. We both wanted to stop. It was a really hot day. Q. Your son wanted to go to	Page 21
2 3 4 5 6 7 8	Q. And where did you stay? A. Different places. We stayed at Skokie. A place in Skokie, Doubletree. Q. Okay. A. Spent two nights there and I'm trying to remember. We stayed in	Page 19	2 3 4 5 6 7 8	A. Yes. Q. And you said who initially wanted to stop? A. We both wanted to stop. It was a really hot day. Q. Your son wanted to go to Best Buy?	Page 21
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		Page 22			Page 24
1	had a camera with him?	-	1	Q. And out of these 20 or so	3
2	A. David always has a camera		2	pictures, how many of them relate to the	
3	with him.		3	parking lot area?	
4	Q. Why is that?		4	A. I don't know. I can't	
5	A. Well, a couple of things.		5	remember.	
6	He has it in his work but also that we		6	Q. What's depicted in any of	
7	I'm an advocate, and so I'm looking		7	the pictures about the parking lot?	
8	for things that are and aren't		8	A. As I remember, there were	
9	accessible always.		9	numerous things wrong.	
10	Q. Okay. And what is the		10	Q. Well, we're just focusing	
11	nature of David's business?		11	specifically on the parking lot only.	
12	A. He's a Realtor.		12	A. Okay.	
13	Q. Who does he work for?		13	Q. First of all, how many	
14	A. Avalar.		14	things were wrong?	
15	Q. Can you spell that for us?		15	A. Numerous things.	
16	A. AVALAR.		16	Q. What does that mean? Does	
17	Q. Is that Cleveland?		17	that mean one, two, five, ten?	
18	A. Yes, it is.		18	A. I don't know. More than two	
19			19		
20	Q. Does Mr. Lott have any sort of disabilities?			and probably less than ten.	
21			20	Q. I want to walk through each	
	A. No.		21	thing that was wrong and we'll talk	
22	Q. Is he a member of Disabled		22	about the specifics. So just first of	
23	Patriots?		23	all, list for me the things that were	
24	A. No.		24	wrong and then we'll get into the	
25	Q. Has he ever been?		25	details of those.	
		Page 23			Page 25
1	A. No.		1	 A. Okay. All the signage was 	
2	Q. Okay. And did you ask him		2	wrong to mark spots.	
3	to take these pictures?		3	Q. What's the next thing?	
4	A. Sure.		4	A. There were no access aisles	
5	Q. And that's the only reason		5	to get from the parking from the car	
6	he took them?		6	to the store without putting going	
7	A. Yes.		7	behind cars which puts you in jeopardy.	
8	Q. And where is the first place		8	Q. Without what?	
9					
, J	you went first of all, I take it		9		
10	you went first of all, I take it your son or David pulled the car in the			A. You have to go when you	
10	your son or David pulled the car in the		10	A. You have to go when you have to go behind the automobiles to get	
10 11	your son or David pulled the car in the parking lot?		10 11	A. You have to go when you have to go behind the automobiles to get into the store, that's against the ADA	
10 11 12	your son or David pulled the car in the parking lot? A. Yes.		10 11 12	A. You have to go when you have to go behind the automobiles to get into the store, that's against the ADA and it's dangerous.	
10 11 12 13	your son or David pulled the car in the parking lot? A. Yes. Q. And where did they park it?	re	10 11 12 13	A. You have to go when you have to go behind the automobiles to get into the store, that's against the ADA and it's dangerous. Q. Okay. What else?	
10 11 12 13 14	your son or David pulled the car in the parking lot? A. Yes. Q. And where did they park it? A. I don't even remember wher	re	10 11 12 13 14	A. You have to go when you have to go behind the automobiles to get into the store, that's against the ADA and it's dangerous. Q. Okay. What else? A. Uneven levels in the parking	
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		Page 26			Page 28
1	Q. Okay. And you have no idea		1	the area you parked, you parked in a	
2	whatsoever what store you parked near?	?	2	disabled spot, right?	
3	 A. Not initially, no. I know 		3	A. Yes.	
4	that ultimately we drove around the		4	Q. And there was a sign saying	
5	entire shopping area.		5	it was a disabled spot, right?	
6	Q. Okay. Just name for me the		6	A. Yes.	
7	different stores that are in that		7	Q. And describe for me as	-
8	shopping area.		8	specifically as you can what the sign	
9	A. There's a Dominic's. There's		9	that you saw looked like and what it	
10	a Walgreens. There's a Jo-Ann Fabrics.		10	said.	
11	There was a Best Buy, as I said. There		11	A. Well, it looked like the	
12	was a Catherine's plus size women's wea	ar	12	traditional handicap parking marker but	
13	store.	a 1	13	if they're not put at the right height	
14			14		
	Q. Anything else?			when you're driving through the parking	
15	A. That's what I remember.		15	lot, it's hard to see where the handicap	
16	Q. Okay. And are they all part		16	parking is.	
17	of the same facility or are they all		17	Q. Well, that wasn't my	
18	independent and separate facilities?		18	question, ma'am. I just want you to	
19	A. I'm pretty sure that Best		19	describe, as specifically as you can,	
20	Buy was freestanding, a stand alone.		20	what the sign said, what color it was,	
21	Oh, there was an Old Country Buffet		21	all the details about the sign that you	
22	there, also.		22	were talking about.	
23	Q. Is that located in the		23	 A. If I'm correct, the sign is 	
24	parking lot?		24	blue and it's got the handicap logo.	
25	A. It was yeah, I think that		25	Q. And so with respect to that	
		5 07			
		Page 27			Page 29
1	had an entrance from the parking lot.	Page 27	1	sign, apart from the height issue which	Page 29
1 2	had an entrance from the parking lot. Q. But out of all those various	Page 27	1 2	sign, apart from the height issue which we'll get into in a minute, there was	Page 29
2	Q. But out of all those various	Page 27	_	we'll get into in a minute, there was	Page 29
2	Q. But out of all those various stores, you have no idea where you	Page 27	2	we'll get into in a minute, there was no issue or problem whatsoever except	Page 29
2 3 4	Q. But out of all those various stores, you have no idea where you parked the car?	Page 2/	2 3 4	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct?	Page 29
2 3 4 5	Q. But out of all those various stores, you have no idea where you parked the car? A. No.	Page 2/	2 3 4 5	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct? A. Not that I can remember.	Page 29
2 3 4 5 6	Q. But out of all those various stores, you have no idea where you parked the car? A. No. Q. Okay. And it was only	Page 2/	2 3 4	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct? A. Not that I can remember. Q. Okay. And what height was	Page 29
2 3 4 5 6 7	Q. But out of all those various stores, you have no idea where you parked the car? A. No. Q. Okay. And it was only parked in one spot, right?	Page 2/	2 3 4 5 6 7	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct? A. Not that I can remember. Q. Okay. And what height was the sign that you're talking about?	Page 29
2 3 4 5 6 7 8	Q. But out of all those various stores, you have no idea where you parked the car? A. No. Q. Okay. And it was only parked in one spot, right? A. Right.	Page 2/	2 3 4 5 6 7 8	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct? A. Not that I can remember. Q. Okay. And what height was the sign that you're talking about? A. I don't know but I know that	Page 29
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. But out of all those various stores, you have no idea where you parked the car? A. No. Q. Okay. And it was only parked in one spot, right? A. Right. Q. Okay. Now, with respect to the signs, you said all the signs were wrong. A. Right. Q. Explain in more detail what you're talking about. A. Well, they couldn't be seen.		2 3 4 5 6 7 8 9 10 11 12 13 14 15	we'll get into in a minute, there was no issue or problem whatsoever except for the height; is that correct? A. Not that I can remember. Q. Okay. And what height was the sign that you're talking about? A. I don't know but I know that it wasn't up high enough to see, as you were driving around in the parking lot. Q. So you have no idea whatsoever how high it was? A. No. No, I don't. Q. And you didn't take any measurements?	Page 29
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1 A. No. 2 Q. Okay. And so with regard to 3 this problem or alleged problem with the 4 sign, that's the only problem you can 5 think of? 6 A. With the sign. 7 Q. Yeah. 8 A. Yes. 9 Q. That's it? 10 A. Yes. 11 Q. Now, you also said something 12 about marked spots. 13 Was there some problem with the 14 marking of the spots? 15 A. No. What I'm saying, if the 16 sign's not high enough when you're 17 driving through, you can't see where the 18 handicap spots are. 19 Q. Okay. Well, you're saying 19 Q. Okay. Well, you're saying 20 in general that could be a problem but 21 certainly you saw the sign and parked in 22 the spot, didn't you, ma'am? 23 A. Ultimately. 24 Q. Okay. Now, there's no other 25 problem with the markings on the spots, 26 wheelchair or someone's pushing your 27 wheelchair or someone's pushing your 28 wheelchair, there always can be a 3 wheelchair, there always can be a 3 wheelchair, there always can be a 3 wheelchair, there always can be a 4 sign, that's the only problem that someone might see 4 you in their rearview, right? A. Correct. 7 Q. Okay. Now, and when you 8 were walking through this particular 9 parking lot you didn't have any 9 encounters where you were put in danger 11 because of that, correct? 12 A. But you're always in danger 13 when you're passing behind a car. 14 Q. Well, that wasn't my 15 question. When you walked through this 16 particular parking lot on that 17 particular occasion, you had no problems 18 whatsoever in terms of cars getting 19 close to you, almost hitting you, 19 anything like that? 20 Q. And this access aisle, are 21 A. No. 22 Q. And this access aisle, are 23 you saying there was no access aisles at 24 all? 25 A. Not that not in the place		Case 1.07-CV-00302 D0C	ument 19	-4	Filed 03/00/2006 Page 10 01 22	
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	Page 34			Page 36
1	at all about that?	1	facilities?	
2	A. No.	2	A. Because if I did that,	
3	Q. Okay. And you didn't bother	3	that's all I would ever do in my life.	
4	to count at the time?	4	There would never be anything but	
5	A. No.	5	complaining about things that are not	
6	Q. Okay. And you didn't take	6	right or safe.	
7	any notes whatsoever while you were	7	Q. Well, ma'am, you waited to	
8	there?	8	file this lawsuit. What I'm asking is,	
9	A. No.	9	why at any time prior to filing this	
10	Q. And you didn't make any	10	lawsuit didn't you bother to pick up the	
11	report while you were there?	11	phone or send a letter or send an	
12	A. No.	12	e-mail or try to contact anyone and tell	
13	Q. And you didn't make any	13	them about these alleged problems?	
14	complaint to anybody while you were	14	A. Sir, if you could have a	
15	there?	15	sense of how much I e-mail people	
16	A. No.	16	telling them or asking them to pay	
17	Q. And you never complained to	17	attention to the fact that their places	
18	any of the stores in the facility after	18	are not ADA compliant, it would be a	
19	you left, correct?	19	tome of complaints that I and e-mails	
20	A. That is correct.	20	that I've made. I'm used to not	
21	Q. And how far was since we	21	getting any kind of acknowledgment at	
22	don't have any idea where you parked,	22	all and that's why I don't always do	
23	right, because you don't remember that,	23	it. It's	
24	right?	24	Q. This facility you never	
25	A. Correct.	25	tried, right?	
	711 35113311		trica, right.	
	Page 35			Page 37
1	Page 35 Q. And so can you give me any	1	A. No, I did not.	Page 37
2		Ι.	A. No, I did not. Q. Okay. Now, have you told me	Page 37
	Q. And so can you give me any	1		Page 37
2	Q. And so can you give me any indication of how far away an access	1 2	Q. Okay. Now, have you told me	Page 37
2	Q. And so can you give me any indication of how far away an access aisle was from where you did park? A. A ways away.	1 2 3	Q. Okay. Now, have you told me everything that was in your mind	Page 37
2 3 4	Q. And so can you give me any indication of how far away an access aisle was from where you did park?	1 2 3 4	Q. Okay. Now, have you told me everything that was in your mind improper with respect to the access	Page 37
2 3 4 5	Q. And so can you give me any indication of how far away an access aisle was from where you did park? A. A ways away. Q. Well, what does that mean?	1 2 3 4 5	Q. Okay. Now, have you told me everything that was in your mind improper with respect to the access aisles? A. Yes.	Page 37
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. And so can you give me any indication of how far away an access aisle was from where you did park? A. A ways away. Q. Well, what does that mean? Are you talking A. I don't even know that I remember that there was any access aisle. Q. Well, you just told me that there was. A. In other parking places. In other parking areas but not where I parked. Q. I understand that. But what I'm saying is, wherever it was that you parked, where was the closest access aisle to where you parked? A. I can't tell you that. Q. Any idea whatsoever? A. No. Q. Okay. Now, when you were	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. Now, have you told me everything that was in your mind improper with respect to the access aisles? A. Yes. Q. Okay. Now, you also stated that there was some what you call uneven levels in the parking lot and I'm trying to understand what you're talking about. What do you mean? A. When the pavement changes level, that's not a gigantic issue for a walker. It is a gigantic issue sometimes for someone in a chair. Q. Okay. Just so I'm clear. Between the time where you parked in this unknown spot until you went into the first building and what building was that? A. It was a mall entrance. Q. Okay. And where was the	Page 37

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		Page 38			Page 40
1	Q. Well, is that it or are you		1	Q. And that's the best you can	-
2	just speculating?		2	say about that?	
3	A. I'm speculating.		3	A. Yeah. I mean, it was enough	
4	Q. So you don't have any idea		4	that it caught my attention to even	
5	what entrance you actually went in?		5	mention it.	
6	A. It was on a side where the		6	Q. So they didn't tip you over	
7	Catherine's store was on that side also.		7	or anything like that?	
8			8	· -	
	Q. That's the best you can say?A. Yes.			A. No, but under different	
9			9	circumstances it can.	
10	Q. And how long many feet		10	Q. But it didn't on that	
11	was it approximately from where you		11	occasion?	
12	parked to where you went in this		12	A. No, it did not.	
13	entrance?		13	Q. And is that the only spot	
14	A. I don't know. I'm not very		14	where it was uneven, ma'am?	
15	good at judging that.		15	 A. No, there were other places 	
16	Q. I mean, are we talking about		16	that were uneven also.	
17	10 feet, more like 50 feet		17	Q. Where would we find these	
18	A. No.		18	places? How would we locate where they	
19	Q or like a hundred feet?		19	are anywhere in the parking lot?	
20	A. No, probably, again,		20	A. I mean, if you would take a	
21	somewhere between 10 and 50 feet I would		21	walk around, you would be able to see	
22	guess.		22	places that are not level.	
23	Q. That's your best estimate?		23	Q. Well, I'm not talking about	
24	A. That's my best estimate.		24	doing it now, ma'am. Do you have any	
25	Q. Okay. And when you were		25	idea as you sit here now under oath	
	Q. Oldy. 7tha Wich you were				
		Page 39			Page 41
	walking you use the wheelchair			bara thaca anata ara in tha narking	
1	walking you use the wheelchair		1	where these spots are in the parking	
2	yourself or someone push you?		2	lot?	
				· · · · · · · · · · · · · · · · · · ·	
2	yourself or someone push you?		2	lot?	
2 3	yourself or someone push you? A. Well, it depends. On this		2 3	lot? A. No.	
2 3 4	yourself or someone push you? A. Well, it depends. On this occasion I was being pushed because I		2 3 4	Iot? A. No. Q. Okay. And you have nothing	
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			-	
	Page 42			Page 44
1	improper?	1	certain stores and it was it had to	-
2	A. Yes.	2	have been one of those, I think.	
3	Q. Okay. Nothing else	3	Q. But you have no idea what	
4	whatsoever?	4	store it was in?	
5	A. I'm telling you everything I	5	A. It had to be an accessible	
6	can remember.	6	bathroom. No.	
7	Q. Okay. Now, with respect to	7	Q. Now, and you went into one	
8	the physical facility itself, any of	8	bathroom?	
9	these stores or mall areas or anything	9	A. I went in to use a bathroom,	
10	like that, what is the next thing that	10	yes.	
11	you think is wrong or in violation?	11	Q. Just one?	
12	A. Well, there were all kind of	12	A. Yes.	
13	things that were wrong and in violation.	13	Q. Okay. So the hour you were	
14	Q. Well, tell me the next	14	there or so you just went in one	
15	thing, ma'am.	15	bathroom?	
16	A. There were bathroom there	16	A. Yes. I know David and	
17	was a bathroom I went into where the	17	Matthew went to the bathroom, as well.	
18	just to note, the sink wasn't wrapped	18	Q. But you never went into	
19	underneath, so if I pulled under, I was	19	their bathrooms, did you?	
20	at jeopardy of burning myself on a pipe.	20	A. No, I didn't go into the	
21	There was a bathroom that had	21	men's bathroom.	
22	women's machines, the sanitary napkin	22	Q. Okay. At any time, right?	
23	dispenser and stuff was at the wrong	23	A. Right, at any time.	
24	height that I couldn't use.	24	Q. Okay. So with respect to	
25	There were hooks on the back of	25	these problems you described for me,	
	Page 43			Page 45
1	Page 43 bathroom the commode doors that I	1	they were all based upon your own visual	Page 45
1 2		1 2	they were all based upon your own visual observations in one bathroom but you	Page 45
	bathroom the commode doors that I	1		Page 45
2	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on	2	observations in one bathroom but you	Page 45
2 3	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on the wrong side.	2	observations in one bathroom but you can't identify the location, right? A. That is correct.	Page 45
2 3 4 5	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on the wrong side. The grab bars weren't in the	2 3 4	observations in one bathroom but you can't identify the location, right? A. That is correct. Q. And you said that in this	Page 45
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2 3 4 5 6	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on the wrong side. The grab bars weren't in the right place and one wasn't long enough to support standing up comfortably.	2 3 4 5 6	observations in one bathroom but you can't identify the location, right? A. That is correct. Q. And you said that in this	Page 45
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on the wrong side. The grab bars weren't in the right place and one wasn't long enough to support standing up comfortably. Q. Anything else with respect to the bathrooms? A. Nothing that I can remember. Q. Okay. This bathroom that we're talking about, where was it located? Was it in one of these stores? A. Yeah. Q. It was? A. I'm pretty sure it was in the store, yes. Q. But you don't know for sure? A. I don't remember. Q. And you don't know what store it was in?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	observations in one bathroom but you can't identify the location, right? A. That is correct. Q. And you said that in this bathroom first of all, you spent what, about three or four minutes in there? A. No, no, no, no, no. Q. What? A. There's no such thing as three or four minutes. It takes some time to figure out how to use the bathroom and using it especially it's time consuming when everything is right and it's more time consuming when things are not correct. Q. Okay. Well, with respect to this bathroom you were in, ma'am, how much time did you spend in there? A. At least ten minutes. Q. Did you take any pictures?	Page 45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	bathroom the commode doors that I couldn't hang anything on. The flush on the toilet was on the wrong side. The grab bars weren't in the right place and one wasn't long enough to support standing up comfortably. Q. Anything else with respect to the bathrooms? A. Nothing that I can remember. Q. Okay. This bathroom that we're talking about, where was it located? Was it in one of these stores? A. Yeah. Q. It was? A. I'm pretty sure it was in the store, yes. Q. But you don't know for sure? A. I don't remember. Q. And you don't know what store it was in? A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	observations in one bathroom but you can't identify the location, right? A. That is correct. Q. And you said that in this bathroom first of all, you spent what, about three or four minutes in there? A. No, no, no, no, no. Q. What? A. There's no such thing as three or four minutes. It takes some time to figure out how to use the bathroom and using it especially it's time consuming when everything is right and it's more time consuming when things are not correct. Q. Okay. Well, with respect to this bathroom you were in, ma'am, how much time did you spend in there? A. At least ten minutes. Q. Did you take any pictures? A. Yes.	Page 45
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		Page 46			Page 48
1	came in and poked his head in and too		1	cautious because I saw it wasn't	-55
2	some.		2	wrapped.	
3	Q. So he took some pictures		3	Q. And are you aware of anyone	
4	later?		4	ever getting their leg burned against	
5	A. Yeah.		5	that sink in that bathroom?	
6	Q. Did he take any pictures of		6	A. Am I aware of personally	
7	any other bathrooms?		7	someone in my life having their leg	
8	A. I think he did.		8	burnt under a sink, no.	
9	Q. You don't know if he did or		9	Q. Yeah.	
10	not?		10	A. No.	
11	A. No, he did. He did he		11	Q. Okay. And certainly, you're	
12	took some pictures of a men's bathroo	m	12	not aware of anyone at this facility	
13	that was not correct either.	111	13	that ever happening to, right?	
14	Q. Okay. Well, the pictures		14	A. That is correct.	
15	that you have, are we able to tell by		15	Q. And you didn't do any tests,	
16	looking at the pictures if it's the		16	such as turning on the hot water or	
17	men's bathroom or if the women's		17	anything like that to see if the pipe	
18					
19	bathroom or anything like that? A. Yeah.		18	would get warm, did you, ma'am?	
20			19 20	A. I washed my hands.	
	Q. Okay. So whatever pictures)		Q. And you didn't touch the	
21	there are, there's markings that will		21	pipe to see if it was warm, did you,	
22	tell us which one's the women's one ar	ıa	22	ma'am?	
23	which one's the men's one?		23	A. No.	
24	A. Where you see the sanitary		24	Q. So whether it was wrapped or	
25	napkins, that's the women's.		25	not, you have no idea what the	
1		Page 47			Page 49
1	O. Okay. And then the nicture	Page 47	1	temperature of it was or whether it was	Page 49
1 2	Q. Okay. And then the picture	_	1 2	temperature of it was or whether it was	Page 49
2	of the men's bathroom, is it one	_	2	even hot to the touch, right?	Page 49
2 3	of the men's bathroom, is it one bathroom or is it more than one?	_	2	even hot to the touch, right? A. No, but I do know that the	Page 49
2 3 4	of the men's bathroom, is it one bathroom or is it more than one? A. I think it was one or two	_	2 3 4	even hot to the touch, right? A. No, but I do know that the law asks that pipes be wrapped.	Page 49
2 3 4 5	of the men's bathroom, is it one bathroom or is it more than one? A. I think it was one or two bathrooms, I can't be sure.	_	2 3 4 5	even hot to the touch, right? A. No, but I do know that the law asks that pipes be wrapped. Q. I understand that. But you	Page 49
2 3 4 5 6	of the men's bathroom, is it one bathroom or is it more than one? A. I think it was one or two bathrooms, I can't be sure. Q. Okay. And what facilities	S	2 3 4 5 6	even hot to the touch, right? A. No, but I do know that the law asks that pipes be wrapped. Q. I understand that. But you have no idea whether even if it one	Page 49
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	Page	50		Page 52
1	your legs and it is really hot, so that	1	put anything on the hook, did you?	- J
2	you don't get burnt.	2		
3	Q. Are you aware with anyone	3	5 / 1	
4	besides yourself with a disability who's	4		
5	ever in any of the bathrooms at this	5	- · · · · · · · · · · · · · · · · · · ·	
6	site?		, , , , , , , , , , , , , , , , , , , ,	
		6	•	
7	A. I would have to think that	7	• • • • • • • • • • • • • • • • • • • •	
8	in life that there was someone in a	8	•	
9	wheelchair in that bathroom.	9	, , ,	
10	Q. Well, no, I don't want you	10	You didn't try to put anything on the	
11	to speculate or make up. You have no	11	hook at all, did you, ma'am?	
12	knowledge of that, right?	12		
13	A. No.	13	Q. And how large was the	
14	Q. Okay. Now, with respect to	14	•	
15	the next problem you identified in the	15		
16	bathroom and now I can't even read my	16	,	
17			•	
	own notes is the pipe sink issue. The	17	,	
18	next thing before the hooks, I'm sorry,	18		
19	what did you say?	19	<u> </u>	
20	A. There was a hook on the back	20	•	
21	of the commode door to hang something	21		
22	but it was not in my reach.	22	Q. Just one freestanding toilet	
23	Q. Okay. It wasn't at your	23	unit?	
24	reach of your sitting in your	24	A. Yes.	
25	wheelchair?	25	Q. No stall no individual	
ı				
1	A Correct	1 .	stalls within the hathroom?	Page 53
1	A. Correct.	1		Page 53
2	A. Correct.Q. What was the height of it?	1 2	A. No, I'm saying inside the	Page 53
2 3	A. Correct.Q. What was the height of it?A. I couldn't tell you but it	1 2 3	 A. No, I'm saying inside the bathroom that had more than one stall. 	Page 53
2 3 4	A. Correct.Q. What was the height of it?A. I couldn't tell you but itwas at least it was outside of my	1 2 3 4	A. No, I'm saying inside the bathroom that had more than one stall. Q. Okay. So how many stalls	Page 53
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		Page 54			Page 5
1	Q. Okay. But you were able to		1	of this bar?	
2	do that, right?		2	A. Yes.	
3	A. With much difficulty.		3	Q. Okay. And is there a	
4	Q. And so according to you,		4	picture that tells us that this bar was	
5	there was a grab bar that wasn't present		5	in the women's bathroom versus some	
6	where it should have been at the back		6	other bathroom?	
7	of the toilet?		7	A. No.	
8	A. Correct.		8	Q. So	
9	Q. And it wasn't there at all		9	A. I don't think so.	
10	or it just wasn't at the right height?		10	Q looking at the various	
11	A. It wasn't at the right		11	pictures, we have no idea which grab	
12	height.		12	bar	
13	Q. And what height was it at?		13	A. Right.	
14	A. No, the height was all		14	Q bathroom this one's in?	
15	right. It wasn't wide enough.		15	A. That is correct,	
16	Q. It wasn't what?		16	Q. So there's really no evidence	
17	A. The bar was not wide enough		17	apart, from your testimony about the	
18	for me to do the requisite turning		18	grab bar?	
19	around which is complex to start with.		19	A. Correct.	
20	Q. What do you mean wide		20	Q. Okay. And the hooks, is	
21	enough?		21	_ · · · · · · · · · · · · · · · · · · ·	
22	A. The bar there's a length		22	there any picture of the hook in your bathroom?	
23	of a bar, right, if you were standing		23		
24	it on the floor it would be two feet or			A. Yes.	
25			24	Q. And are we able to tell by	
	three feet or four feet long, and it		25	looking at the pictures that the hook	
		Page 55			Page 5
1	wasn't regulation length.	Page 55	1	you're talking about is in this	Page 5
2	Q. And what's the length	Page 55	2	you're talking about is in this particular bathroom?	Page 5
2 3	Q. And what's the length supposed to be?	Page 55		particular bathroom? A. I'm not sure.	Page 5
2 3 4	Q. And what's the length supposed to be? A. I don't know but I know that	Page 55	2	particular bathroom?	Page 5
2 3 4 5	Q. And what's the length supposed to be?	Page 55	2	particular bathroom? A. I'm not sure.	Page 5
2 3 4 5 6	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot Q. Even though you don't know	Page 55	2 3 4	particular bathroom? A. I'm not sure. Q. No idea at all?	Page 5
2 3 4 5	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot	Page 55	2 3 4 5	particular bathroom? A. I'm not sure. Q. No idea at all? A. I'm not sure. Q. Now, you said I think the	Page 5
2 3 4 5 6 7 8	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot Q. Even though you don't know what the regulation length you're talking about but you say this one	Page 55	2 3 4 5 6	particular bathroom? A. I'm not sure. Q. No idea at all? A. I'm not sure.	Page 5
2 3 4 5 6 7 8 9	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot Q. Even though you don't know what the regulation length you're	Page 55	2 3 4 5 6 7	particular bathroom? A. I'm not sure. Q. No idea at all? A. I'm not sure. Q. Now, you said I think the next thing was the toilet flusher was on	Page 5
2 3 4 5 6 7 8 9	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot Q. Even though you don't know what the regulation length you're talking about but you say this one	Page 55	2 3 4 5 6 7 8	particular bathroom? A. I'm not sure. Q. No idea at all? A. I'm not sure. Q. Now, you said I think the next thing was the toilet flusher was on the wrong side?	Page 5
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2 3 4 5 6 7 8 9 10	Q. And what's the length supposed to be? A. I don't know but I know that it wasn't because I've seen a lot Q. Even though you don't know what the regulation length you're talking about but you say this one wasn't? A. No, I could tell you	Page 55	2 3 4 5 6 7 8 9	particular bathroom? A. I'm not sure. Q. No idea at all? A. I'm not sure. Q. Now, you said I think the next thing was the toilet flusher was on the wrong side? A. Yeah. Q. And what side is it supposed	Page 5
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	Page 58			Page 60
1	Q. Okay. So if you're sitting	1	so	
2	on the toilet, it would on be on the	2	Q. I understand that. I'm just	
3	left side of the toilet?	3	asking you don't know anybody else?	
4	A. Hm-hm.	4	A. No.	
5	Q. You have to say yes or no.	5	Q. Okay. Now, was there	
6	A. Yes.	6	anything else that was deficient or in	
7	Q. And you think it should have	7	violation with respect to the bathroom	
8	been on the right?	8	•	
9			that you were in, ma'am?	
	A. I don't think. I know it	9	A. Not that I can remember.	
10	should have been on the right side.	10	Q. Okay. And you never went in	
11	Q. And why is that?	11	the bathrooms that David or your son	
12	A. Because it's the law.	12	went into, right?	
13	Q. It has to be on the right	13	A. No.	
14	side instead of the left?	14	Q. So you can't tell me from	
15	A. That is correct.	15	your own personal experience what, if	
16	Q. Is there any pictures	16	any, violations or deficiencies there	
17	A. It has to be it has to be	17	were in those, correct?	
18	on the open side.	18	A. No, but David is learning a	
19	Q. It has to be on the side	19	lot about ADA.	
20	that's away from the wall?	20	Q. Well, I'm not asking what	
21	A. Right.	21	David might be able to talk about or	
22	Q. Okay. Are there any	22		
			not. But as far as you go, you never	
23	pictures of this?	23	set foot in those bathrooms, so you have	
24	A. Yes.	24	no personal knowledge of any	
25	Q. And from the pictures, can	25	deficiencies or violations in those	
	Page 59			Page 61
1	we tell what bathroom you're talking	1	bathrooms, correct?	_
2	about?	2	A. I did not go into the men's	
3	A. I'm pretty sure you can.	3	room, that's correct.	
4	Q. Okay. You obviously were	4	Q. Okay. So you don't have any	
			Q. Okay. 30 you don't have any	
1 5	able to fluch the toilet malam right?	5	knowledge of any violations or alleged	
5	able to flush the toilet, ma'am, right?	5	knowledge of any violations or alleged	
5 6	A. Ultimately.	6	violations in those bathrooms, correct?	
6 7	A. Ultimately.Q. Okay. And do you know	6 7	violations in those bathrooms, correct? A. Beyond the photos.	
6 7 8	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem	6 7 8	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me	
6 7 8 9	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet?	6 7 8 9	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with	
6 7 8 9 10	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say.	6 7 8 9 10	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in,	
6 7 8 9 10 11	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of	6 7 8 9 10 11	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right?	
6 7 8 9 10 11 12	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever	6 7 8 9 10 11 12	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in,	
6 7 8 9 10 11	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of	6 7 8 9 10 11	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right?	
6 7 8 9 10 11 12	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever	6 7 8 9 10 11 12	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory.	
6 7 8 9 10 11 12 13	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom	6 7 8 9 10 11 12 13	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area	
6 7 8 9 10 11 12 13 14 15	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone	6 7 8 9 10 11 12 13 14	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any	
6 7 8 9 10 11 12 13 14 15 16	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally.	6 7 8 9 10 11 12 13 14 15 16	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What	
6 7 8 9 10 11 12 13 14 15 16	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to	6 7 8 9 10 11 12 13 14 15 16 17	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else?	
6 7 8 9 10 11 12 13 14 15 16 17 18	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in	6 7 8 9 10 11 12 13 14 15 16 17 18	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what	
6 7 8 9 10 11 12 13 14 15 16 17 18	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or	6 7 8 9 10 11 12 13 14 15 16 17 18 19	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do you know of anyone else out there in	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so used to interior issues that it's hard	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do you know of anyone else out there in the world who ever had any problems with	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	violations in those bathrooms, correct? A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so used to interior issues that it's hard to separate one from the next. The	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do you know of anyone else out there in the world who ever had any problems with those bathrooms?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so used to interior issues that it's hard to separate one from the next. The bathroom I used I had specific issues	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do you know of anyone else out there in the world who ever had any problems with those bathrooms? A. No, but I'm certainly not	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so used to interior issues that it's hard to separate one from the next. The bathroom I used I had specific issues with. I really can't remember.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Ultimately. Q. Okay. And do you know anybody out there who ever had a problem with the toilet? A. I can't personally say. Q. Okay. And do you know of anyone at all in this universe who ever had problems at all with this bathroom that you've been describing? A. I don't know of anyone personally. Q. Okay. And with regard to other bathrooms that you didn't go in that your son might have went in or your companion might have went in, do you know of anyone else out there in the world who ever had any problems with those bathrooms?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Beyond the photos. Q. Okay. Now, you've told me now everything that was deficient with respect to the bathroom you were in, right? A. To the best of my memory. Q. Now, what is the next area of these facilities that you have any problem with? We've covered the parking lot. We covered the bathroom. What else? A. I'm trying to remember what were other issues. I recall that there were lots of exterior issues. I'm so used to interior issues that it's hard to separate one from the next. The bathroom I used I had specific issues	

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	Page 62			Page 64
1	This is your deposition. You're a	1	A. Yes.	
2	plaintiff in this case, alleging that	2	Q. And there's no problems that	
3	this facility was somehow in violation	3	you saw in Dominic's, right?	
4	of the ADA.	4	A. Well, there's I can't	
5	Is there any other violations,	5	even there's problems everywhere but	
6	ma'am, that you could speak to today	6	no, there was nothing	
7	while you're under oath in support of	7	Q. Okay.	
8	your case?	8	A that jumped out at me,	
9	A. I can't remember.	9	no.	
10	Q. None at all, correct?	10	Q. And after you left Dominic's,	
11	A. I can't remember.	11	you went where within these facilities?	
12	Q. Okay. And after did you	12	A. We went to Walgreens.	
13	use the bathroom right away when you got	13	Q. Okay. And how did you get	
14	there or did you shop at first?	14	from the Dominic's to the Walgreens, did	
15	A. I think we shopped for a few	15	you have to walk outside?	
16	minutes. I can't I don't remember	16	A. I don't think so.	
17	walking in there in urgent need of a	17	Q. So you think there's a	
18	bathroom.	18	connective between the Dominic's and the	
19	Q. I'm sorry, I couldn't hear	19	Walgreens inside?	
20	that last part.	20	A. I can't remember for sure.	
21	A. I do not remember having	21	Q. So you don't know if there	
22	urgent need for the bathroom when I	22		
23	walked in, so we probably shopped for a	23	A. Right.	
24	bit before I used the bathroom.	24	Q. And you don't know if you	
25		25	went outside the Walgreens to get to the	
25	Q. Okay. Ma'am, what store did	25		
	Page 63			Page 65
1	you first go to? You said you parked	1	Dominic's or strike that.	
2	the car. We talked about that. We	2	You don't know if you went	
3	talked about you walking the 10 to 50	3	outside the Dominic's to get to the	
4	feet to an entrance. We talked about	4	Walgreens, correct?	
5	you going inside but where did you first	5	A. I'm trying to remember. It	
6	go, ma'am?	6	was a very hot day; that's all I do	
			was a very not day, that's all I do	
7	A. I went to Dominic's.	7	remember.	
8				
8 9	A. I went to Dominic's.	7 8 9	remember.	
8 9 10	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct.	7 8 9 10	remember. Q. But you don't know if you had to do that? A. No.	
8 9 10 11	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend	7 8 9 10 11	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this	
8 9 10 11 12	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there?	7 8 9 10 11 12	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in	
8 9 10 11	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend	7 8 9 10 11 12 13	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this	
8 9 10 11 12 13 14	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or	7 8 9 10 11 12 13 14	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think.	
8 9 10 11 12 13	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes.	7 8 9 10 11 12 13 14 15	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there?	
8 9 10 11 12 13 14	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or	7 8 9 10 11 12 13 14	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think.	
8 9 10 11 12 13 14 15	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son?	7 8 9 10 11 12 13 14 15	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David?	
8 9 10 11 12 13 14 15 16	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David.	7 8 9 10 11 12 13 14 15 16	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me.	
8 9 10 11 12 13 14 15 16	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy	7 8 9 10 11 12 13 14 15 16 17	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you	
8 9 10 11 12 13 14 15 16 17	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's?	7 8 9 10 11 12 13 14 15 16 17 18	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens?	
8 9 10 11 12 13 14 15 16 17 18 19	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's? A. Yes.	7 8 9 10 11 12 13 14 15 16 17 18 19	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens? A. Not very long. Q. Less than five minutes? A. No, more than five.	
8 9 10 11 12 13 14 15 16 17 18 19 20	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's? A. Yes. Q. Okay. You never set foot in	7 8 9 10 11 12 13 14 15 16 17 18 19 20	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens? A. Not very long. Q. Less than five minutes?	
8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's? A. Yes. Q. Okay. You never set foot in Best Buy, correct?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens? A. Not very long. Q. Less than five minutes? A. No, more than five. Probably less than ten minutes. Q. And all you purchased was	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's? A. Yes. Q. Okay. You never set foot in Best Buy, correct? A. Correct. Q. And Dominic's, you just spent some time in gathering some food items	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens? A. Not very long. Q. Less than five minutes? A. No, more than five. Probably less than ten minutes. Q. And all you purchased was the Altoids?	
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I went to Dominic's. Q. Okay. The grocery store, right? A. Correct. Q. And how long did you spend in there? A. 15 minutes. Q. Was that just by yourself or with David and your son? A. With David. Q. And your son was in Best Buy while you were in Dominic's? A. Yes. Q. Okay. You never set foot in Best Buy, correct? A. Correct. Q. And Dominic's, you just spent	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	remember. Q. But you don't know if you had to do that? A. No. Q. And when you went to this Walgreens, what was your purpose in going there? A. Altoids, I think. Q. Okay. For you or for David? A. Me. Q. And how many minutes did you spend in the Walgreens? A. Not very long. Q. Less than five minutes? A. No, more than five. Probably less than ten minutes. Q. And all you purchased was	

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		Page 66			Page 68
1	There was water maybe purchased the	ere,	1	A. Yes.	
2	too.		2	Q. And by yourself?	
3	Q. Anything else?		3	A. Yes.	
4	A. I don't think so.		4	Q. Using your wheelchair?	
5	Q. And you didn't notice any		5	A. Yes.	
6	problems or violations in the Walgreer	ns,	6	Q. How long did you spend in	
7	did you, ma'am?		7	there?	
8	A. Well, counters are always a	ın	8	A. Five minutes. Less maybe	
9	issue.		9	less than five minutes.	
10	Q. Now, but specifically in the		10	Q. What did you do?	
11					
	Walgreens, you can't recall anything in		11	A. Nothing. Just poked my head	
12	particular that was an issue, can you?		12	around, looked around.	
13	A. No, because it's so perpetu	aı	13	Q. It's a clothing store?	
14	that I can't always remember.		14	A. Yes.	
15	Q. So there's no violations you		15	Q. And you didn't notice any	
16	can delineate from each day with resp	ect	16	problems or violations there, did you,	
17	to the Walgreens or the Dominic's,		17	ma'am?	
18	right?		18	A. I didn't notice.	
19	A. No.		19	Q. And did you buy anything?	
20	Q. And then after you were in		20	A. No.	
21	the Walgreens, where did you go next		21	Q. Where did you go next?	
22	A. I don't remember.	= :	22	A. I think we left.	
23	Q. Any idea at all, ma'am?		23	Q. That was the extent of your	
23 24	A. I Think I poked my head in	to		entire visit there?	
2 1 25	the Catherine's store.	i.o	25	A. Yes.	
			23	A. 103.	
	0 14/11 5 1 15	Page 67		0.4.11.5	Page 69
1	Q. With David?		1	Q. And before you left the	
2	A. Yeah. No, actually, David,		2	Catherine's, did you do anything else	
3	I think, went to see where Matthew w	as as	3	before you left?	
4	and I rolled into the Catherine's.		4	A. I can't remember.	
5	Q. So you rolled your wheelch	air	5	Q. Okay. So all you can recall	
6	into the Catherine's from Walgreens?		6	is leaving the Catherine's, going back	
7	A. Yeah.		7	to the car, and leaving the facilities,	
8	Q. To get from the Walgreens	to	8	correct?	
9	the Catherine's, did you have to go		9	A. Yes.	
10	outside?		10	Q. And you've described for me	
11	A. No. I mean, David pushed	me	11	with as much detail as you possibly can	
12	over to Catherine's and then I went in		12	give me everything that you did while	
13		11.0	13	you were at these premises, correct?	
	the store.				
14	Q. Okay. To get from the		14	A. As much as I can remember.	
15	Walgreens to the Catherine's, did you		15	Q. There's nothing else	
16	have to go outside?		16	whatsoever you can recall, right, ma'am?	
	A. I don't think so. I think		17	A. Nothing I can remember.	
			18	Q. And you didn't document in	
18	they were connected.		10	<u>-</u>	
18		3	19	any way the time that you spent there,	
18 19	they were connected.	2	1	<u>-</u>	
18 19 20	they were connected. Q. Okay. You think they were	•	19	any way the time that you spent there,	
18 19 20 21	they were connected. Q. Okay. You think they were connected in the interior? A. Hm-hm.	2	19 20 21	any way the time that you spent there, did you, ma'am? A. No.	
18 19 20 21 22	they were connected. Q. Okay. You think they were connected in the interior? A. Hm-hm. Q. Is that yes?	2	19 20 21 22	any way the time that you spent there, did you, ma'am? A. No. Q. You never put down in	
17 18 19 20 21 22 23 24	they were connected. Q. Okay. You think they were connected in the interior? A. Hm-hm. Q. Is that yes? A. Yes.		19 20 21 22 23	any way the time that you spent there, did you, ma'am? A. No. Q. You never put down in writing a single word or notes or	
18 19 20 21 22 23 24	they were connected. Q. Okay. You think they were connected in the interior? A. Hm-hm. Q. Is that yes? A. Yes. Q. Okay. And did you actually		19 20 21 22 23 24	any way the time that you spent there, did you, ma'am? A. No. Q. You never put down in writing a single word or notes or anything about this visit, did you,	
18 19 20 21 22	they were connected. Q. Okay. You think they were connected in the interior? A. Hm-hm. Q. Is that yes? A. Yes.		19 20 21 22 23	any way the time that you spent there, did you, ma'am? A. No. Q. You never put down in writing a single word or notes or	

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		Page 70			Page 72
1	A. Well, I journal, so I'm sure	J	1	A. Yes.	
2	there's a journal entry that includes		2	Q. Okay. But with respect to	
3	the visit to Town & Country.		3	the pages that deal with your visit to	
4	Q. Okay. So you have a journal		4	Chicago, you wouldn't have any	
1			5		
5	that actually will tell us the dates			objection, based upon personal reasons	
6	that you were in Chicago back in August		6	or anything to producing those pages,	
7	of 07, correct?		7	would you?	
8	A. Yes, that is true.		8	 A. I'd have to have a really 	
9	Q. And that would tell us any		9	good reason to produce my personal	
10	details that you wrote down at the time		10	journal. What I would do is go back	
11	about your visit to this facility,		11	and look for dates for you.	
12	right?		12	Q. Okay.	
13	A. That is correct.		13	A. I'm not giving you my	
14	Q. Okay. And where is the		14	journal.	
15	journal presently?		15	Q. Apart from you possibly	
16	A. At my home.		16	mentioning in your journal that you went	
17	•		17		
	Q. Did you look at that to			to some stores with your son and your	
18	assist you in preparing to testify here		18	companion, there's nothing in writing	
19	today?		19	whatsoever anywhere that memorializes	
20	A. No.		20	anything about your visit to these	
21	Q. Does your journal contain any		21	premises, right?	
22	notes whatsoever about any deficiencies		22	 A. Beyond photographs. 	
23	or violations at these premises?		23	MR. BACON: I'm not going to	
24	 A. I'm sure I mentioned as 		24	insert an objection here but if I could	
25	always that it's always a little		25	interject, we do have a receipt.	
\vdash			 	· · · · · · · · · · · · · · · · · · ·	
		Page 71			Page 73
1	annalling	Page 71	1	O Okay You have a receint	Page 73
1 2	appalling.	Page 71	1 2	Q. Okay. You have a receipt	Page 73
2	Q. That it's what?	Page 71	2	from being there, ma'am?	Page 73
2	Q. That it's what? A. Appalling.	Page 71	2	from being there, ma'am? A. Yes.	Page 73
2 3 4	Q. That it's what? A. Appalling. Q. Okay. But you don't think	Page 71	2 3 4	from being there, ma'am? A. Yes. Q. And what's the receipt	Page 73
2 3 4 5	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics	Page 71	2 3 4 5	from being there, ma'am? A. Yes. Q. And what's the receipt from which store?	Page 73
2 3 4 5 6	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No.	Page 71	2 3 4 5 6	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens.	Page 73
2 3 4 5 6 7	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged	Page 71	2 3 4 5 6 7	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your	Page 73
2 3 4 5 6 7 8	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged violations	Page 71	2 3 4 5 6 7 8	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your counsel's possession?	Page 73
2 3 4 5 6 7 8 9	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged violations A. No.	Page 71	2 3 4 5 6 7 8 9	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your counsel's possession? A. Yes.	Page 73
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2 3 4 5 6 7 8 9	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged violations A. No.	Page 71	2 3 4 5 6 7 8 9	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your counsel's possession? A. Yes.	Page 73
2 3 4 5 6 7 8 9	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged violations A. No. Q correct? A. I wouldn't write about that	Page 71	2 3 4 5 6 7 8 9	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your counsel's possession? A. Yes. Q. Do you have any other	Page 73
2 3 4 5 6 7 8 9 10 11 12	Q. That it's what? A. Appalling. Q. Okay. But you don't think the journal contains any specifics A. No. Q about any of the alleged violations A. No. Q correct? A. I wouldn't write about that in my journal.	Page 71	2 3 4 5 6 7 8 9 10	from being there, ma'am? A. Yes. Q. And what's the receipt from which store? A. It was Walgreens. Q. Okay. And is that in your counsel's possession? A. Yes. Q. Do you have any other receipts from the visit? A. To the mall?	Page 73
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		Page 74			Page 76
1	happy to give you a copy.		1	there, do you, ma'am?	
2	MR. LEONARD: Yeah, I'd		2	A. I don't know.	
3	appreciate that. That would be great.		3	Q. Well, you just went there by	
4	MR. BACON: If you'll give me		4	chance, right?	
5	one minute here.		5	A. Kind of, yes.	
6	MR. LEONARD: Sure.		6	Q. You had no intention to go	
7	THE WITNESS: And it'll have a		7	there and you didn't know it existed,	
				·	
8	date on it.		8	right?	
9	MR. BACON: Yeah, it has a date		9	A. That is correct.	
10	on it. I have a copy of a Walgreens		10	Q. You just happened to have a	
11	receipt. Susie was the server. It's		11	need to buy something so you decided to	
12	dated August 4, 2007. The time is 2:58		12	pull over and go there, right?	
13	p.m. The address is 235 East Palatine		13	A. Yes.	
14	Road in Arlington Heights. Palatine,		14	Q. Okay. So some day if you	
15	PALATINE. And I actually can't		15	happen to be in that neighborhood and	
16	tell what it is that was purchased; it's		16	you needed to buy something again, that	
17	some coding.		17	might cause you to go there, right?	
18	A. Water.		18	A. Correct.	
19	MR. LEONARD: I appreciate your		19	Q. But you have no present	
20	reading that, Tom, and if you could just		20	intention to go there, do you?	
21	maybe send that to me and fax a copy to		21	A. No.	
22	us.		22	Q. And, in fact, your son lives	
23	MR. BACON: Absolutely.		23	about 40 miles away from there, correct?	
24	Q. Ma'am, hearing your counsel		24	A. I think that's accurate.	
25	read that, does that refresh your		25	Q. As you said, it seems like	
-		Page 75			Page 77
1	recollection that that was the date you	raye /3	1	it was kind of out in the boonies,	raye //
1	•		l T	it was kind of out in the bootiles,	
٦	word thora?		า	right?	
2	were there?		2	right?	
3	A. Yeah.		3	A. Yes.	
3 4	A. Yeah. Q. Okay. And you're not aware		3 4	A. Yes.Q. And you're not aware of	
3 4 5	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing,		3 4 5	A. Yes. Q. And you're not aware of anyone that you know besides yourself	
3 4 5 6	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other		3 4 5 6	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's	
3 4 5	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing,		3 4 5	A. Yes. Q. And you're not aware of anyone that you know besides yourself	
3 4 5 6	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever		3 4 5 6	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's	
3 4 5 6 7 8	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your		3 4 5 6 7	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct.	
3 4 5 6 7 8 9	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right?		3 4 5 6 7 8 9	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone	
3 4 5 6 7 8 9	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No.		3 4 5 6 7 8 9	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you,	
3 4 5 6 7 8 9 10	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No. Q. Okay. Now, ma'am, when is		3 4 5 6 7 8 9 10	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you, ma'am?	
3 4 5 6 7 8 9 10 11 12	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No. Q. Okay. Now, ma'am, when is the first time that you told anybody		3 4 5 6 7 8 9 10 11 12	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you, ma'am? A. No.	
3 4 5 6 7 8 9 10 11 12 13	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No. Q. Okay. Now, ma'am, when is the first time that you told anybody about this facility in Arlington		3 4 5 6 7 8 9 10 11 12 13	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you, ma'am? A. No. Q. Okay. Now, you said you	
3 4 5 6 7 8 9 10 11 12 13 14	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No. Q. Okay. Now, ma'am, when is the first time that you told anybody about this facility in Arlington Heights?		3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you, ma'am? A. No. Q. Okay. Now, you said you contacted a David Pedraza to speak to	
3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yeah. Q. Okay. And you're not aware of anything else, anything in writing, anything written down by hand, any other documents, notes, records whatsoever that would relate in any way to your visit to these premises, right? A. No. Q. Okay. Now, ma'am, when is the first time that you told anybody about this facility in Arlington Heights? A. I'm sure on my return from		3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. Q. And you're not aware of anyone that you know besides yourself and your son and your companion who's ever been there, right? A. Correct. Q. And you don't know anyone who ever plans to go there, do you, ma'am? A. No. Q. Okay. Now, you said you contacted a David Pedraza to speak to him, is that correct?	
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		Page 78			Page 80
1	cases?		1	Pedraza?	
2	 A. Well, yes. He testifies in 		2	A. No.	
3	cases and he's an expert, so we talk		3	Q. And is Pedraza someone who's	
4	about all kinds of things that I see		4	affiliated with Mr. Bacon's law office?	
5	out in the world, I bring them to him.		5	A. Not that I'm aware of.	
6	Q. Does he have disabilities		6	Q. And how does Mr. Pedraza	
7	himself?		7	earn his living?	
8	A. No.		8	A. He is an ADA expert.	
9	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
	Q. Okay. How long have you		9	Q. Meaning, he testifies in	
10	known him?		10	cases for plaintiffs?	
11	A. Three or four years.		11	A. He also has many other	
12	Q. How did you meet him?		12	business interests.	
13	 A. I met him through a friend. 		13	Q. What are those?	
14	He met a friend. They started talking.		14	A. Construction.	
15	He talked about what he did, that he		15	Q. I'm sorry, what?	
16	was working on ADA stuff and she said I		16	A. Construction.	
17	have a friend in a chair and introduced		17	Q. Okay.	
18	us.		18	A. He's a contractor, a general	
19	Q. And who's your friend?		19	contractor.	
20	A. Tracy Greenberg.		20	Q. What's his address?	
	,			•	
21	Q. Where does Mr. Pedraza live		21	A. I don't know.	
22	or have his business office?		22	Q. What town does he live in?	
23	A. In Florida.		23	A. A city outside of Miami.	
24	Q. Have you ever met him in		24	Q. What city is that?	
25	person?		25	A. I don't know.	
		Page 79	l		Page 81
1	Δ Many times	Page 79	1	O What's his phone number?	Page 81
1 2	A. Many times.	Page 79	1	Q. What's his phone number?	Page 81
2	Q. Okay. And so your friend	Page 79	2	A. If you hold a minute, I can	Page 81
2	Q. Okay. And so your friend happened to mention to him that you're	Page 79	2	A. If you hold a minute, I can tell you.	Page 81
2 3 4	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and	Page 79	2 3 4	A. If you hold a minute, I can tell you. Q. Okay.	Page 81
2 3 4 5	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or	Page 79	2 3 4 5	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready?	Page 81
2 3 4 5 6	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you?	Page 79	2 3 4 5 6	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes.	Page 81
2 3 4 5 6 7	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me.	Page 79	2 3 4 5 6 7	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954.	Page 81
2 3 4 5 6 7 8	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four	Page 79	2 3 4 5 6 7 8	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay.	Page 81
2 3 4 5 6 7	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me.	Page 79	2 3 4 5 6 7	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295.	Page 81
2 3 4 5 6 7 8	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four	Page 79	2 3 4 5 6 7 8	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay.	Page 81
2 3 4 5 6 7 8 9	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes.	Page 79	2 3 4 5 6 7 8 9	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295.	Page 81
2 3 4 5 6 7 8 9 10	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he	Page 79	2 3 4 5 6 7 8 9 10	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933.	Page 81
2 3 4 5 6 7 8 9 10 11 12	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you?	Page 79	2 3 4 5 6 7 8 9 10 11 12	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza	Page 81
2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what	Page 79	2 3 4 5 6 7 8 9 10 11 12 13	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of	Page 81
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes.	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza?	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them?	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure.	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining.	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him?	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining. Q. Meaning, like if you went to	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him? A. The defendants, as I believe	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining.	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him?	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining. Q. Meaning, like if you went to	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him? A. The defendants, as I believe	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining. Q. Meaning, like if you went to a facility or store making a complaint	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him? A. The defendants, as I believe it depends on who wins the case. Q. Excuse me?	Page 81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. And so your friend happened to mention to him that you're someone who's impacted by the ADA and that caused what, you called Pedraza or him to call you? A. He called me. Q. And that was three or four years ago? A. Yes. Q. And what did he say when he called you? A. He just wanted to know what I was doing in the way of advocacy, if I had interest in that. Q. And had you done any advocacy, prior to talking to Pedraza? A. Yeah, I had done a lot of complaining. Q. Meaning, like if you went to a facility or store making a complaint to them? A. Absolutely.	Page 79	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. If you hold a minute, I can tell you. Q. Okay. A. Are you ready? Q. Yes. A. It's 954. Q. Okay. A. 295. Q. Okay. A. 5933. Q. Okay. And has Mr. Pedraza served as an expert witness in some of the cases in which you've been a plaintiff? A. Yes. Q. All of them? A. I'm not sure. Q. Who pays him? A. The defendants, as I believe it depends on who wins the case.	Page 81
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